

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- X  
VIRGIN ENTERPRISES LIMITED,

Plaintiff,

- against -

THOMAS FRANK, VIRGIN-INVESTMENT.COM,  
N.C. SMOL, VIRGIN-AMERICA.COM, DIRECT  
INFORMATION PVT LTD, VIRGINMACAU.COM,  
C3 FINANCIAL SERVICES, INC.,  
VIRGINMONEYUSA.COM, INTERNET EQUITY  
INVESTORS, LLC, VIRGINPROPERTIES.COM,  
1734488 ONTARIO INC., VIRGINPROPERTIES.NET,  
QUENTRALL AIR CONDITIONING SERVICES, and  
VIRGIN-PROPERTIES.COM,

Defendants.  
----- X

07 Civ. 6234 (LAP)

ECF CASE

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, on the Declaration of Darcy M. Goddard, dated May 25, 2007, and Exhibits 1 through 15 thereto, and on all other pleadings and papers filed in this action, Plaintiff Virgin Enterprises Ltd. (“VEL”) will move this Court, The Honorable Loretta A. Preska, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, Courtroom 12A, New York, New York 10007-1312, at 9:30 a.m. on September 25, 2007, for an order pursuant to Rule 55(a) of the Federal Rules of Civil Procedure entering judgments upon default of Defendants Thomas Frank (“Frank”), N.C. Smol (“Smol”), Direct Information Pvt Ltd. (“Direct Information”), and Quentrall Air Conditioning Services (“Quentrall”) for failure to plead or otherwise defend the above-captioned action, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
August 31, 2007

FRIED, FRANK, HARRIS, SHRIVER &  
JACOBSON LLP

By s/Darcy M. Goddard  
James W. Dabney  
Darcy M. Goddard

One New York Plaza  
New York, New York 10004-1980  
Telephone: 212.859.8000

Attorneys for Plaintiff Virgin Enterprises Ltd.

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that on the 31<sup>st</sup> day of August, 2007 I caused to be served upon the following, by the methods described below, a true copy of the Notice of Motion and the Declaration of Darcy M. Goddard with exhibits.

**FIRST-CLASS MAIL**

C3 Financial Services Inc  
1417 Allan Lane  
West Chester, PA 19380

Internet Equity Investors, LLC  
3155 East Patrick Lane, Suite 1  
Las Vegas, Nevada 89120-3481

Thomas Frank  
EPS-D 711  
7801 N.W. 37th Street  
Miami, Florida 33166-6559

1734488 Ontario Inc  
42 Mattamy Place  
Nepean, Ontario K2G 6K1  
Canada

**AIRMAIL**

N.C. Smol  
Jan Prinsheem 126  
Hillegom, NE 2182 ZD  
The Netherlands

Direct Information Pvt Ltd  
330 Link Way Estate  
Link Road, Malad (W), Mumbai,  
Maharashtra, India

Quentrall Air Conditioning  
597 High Road  
London, N12 0DY  
England



Edward M. Nadler  
Legal Assistant